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Dear Phyllis:

This letter constitutes our comments on the 2016-2017 Proposed Projects on the Darrington District. Once again, we are frustrated by the short time allowed for feedback regarding so many proposals over such a large area—further complicated by the lack of motorized access to a large portion of the area. It would be helpful if the Forest Service would offer escorted visits to places closed to the public but accessible to FS vehicles during the scoping period. Photographs of current conditions would also be helpful. However, we can offer the following input with the limited information that we have at our disposal.

1.Special Use Permit for Stream Gauging Equipment:

We have no objection to this proposal, as long as it will not require road construction or reconstruction.

2.Segelsen Collaborative Vegetation and Aquatic Restoration Project:

We have previously submitted extensive comments expressing our concerns about this proposal. Those comments are attached and incorporated by reference as part of this comment letter.

Furthermore, we feel that the Segelsen Thin does not meet the requirements for Categorical Exclusion (CE) for the following reasons:

36 CFR 220.6(e)(6) qualifies for CE "Timber stand improvement and/or wildlife habitat improvement activities that do not include the use of herbicides or do not require more than one mile of low standard road construction. Examples include...(ii) Thinning or brush control to improve growth or to reduce fire hazard..." But this plan involves constructing more than a mile of road.

CE is also allowed for "Harvest of live trees not to exceed 70 acres, requiring no more than one half mile of temporary road construction...The proposed action may include incidental removal of trees for landings, skid trails and road clearing. Examples include but are not limited to: (I) Removal of individual trees for sawlogs, specialty products, or fuelwood, and (ii), Commercial thinning of overstocked stands to achieve the desired stocking level to increase health and vigor." 36 CFR 220.6(e)(12). But once again the "temporary" road mileage restriction renders this CE category inapplicable. As we have stated in our previous comments, this project requires an Environmental Assessment (EA).

3. North Zone Huckleberry Enhancement:

There are many unanswered questions about this project, which should be addressed with an EA. Is this proposal within Late Successional Reserve? Will road construction or reconstruction be required? We observe that the extensive windthrow that resulted from the numerous severe storms this past winter will have opened up forest canopy in many locations. This may have achieved the stated purpose already, without the cost and adverse environmental effects of roadwork, heavy equipment operation, and anthropogenic tree felling.

4. Blowdown Salvage:

After visiting the Suiattle blowdown area, we have several concerns about removing these trees, which would also apply to the Old Sauk trail area—with the addition of adverse impacts on recreation at the latter site. This old growth forest is designated as Late Successional Reserve under the Northwest Forest Plan (NFP). According to the Plan Standards and Guidelines (S&G) for Salvage in Late Successional Reserves, "Salvage in disturbed sites of less than 10 acres is not appropriate because small forest openings are an important component of old-growth forests. In addition, salvage should occur only in stands where disturbance has reduced canopy closure to less than 40 percent, because stands with more closure are likely to provide some value for species associated with these forests." (C-14, 1). The canopy closure in this area easily exceeds 40 percent.

While #5 under these guidelines acknowledges that "Some salvage that does not meet the preceding guidelines will be allowed when salvage is essential to reduce the future risk of fire or insect damage to late-successional forest conditions," (incidentally noted as most likely in other areas than the Western Cascades), the guideline continues, "It is important to understand that some risk associated with fire and insects is acceptable because they are natural forces influencing late-successional forest development. Consequently, salvage to reduce such risks should focus only on those areas where there is a high risk of large-scale disturbance." (C-15, 5)

It has not been demonstrated that such a high risk exists here. Furthermore, the unprecedented (at least during the preceding three decades) wind storms of 2015-2016 have left windthrown trees all over the District. Removing the relatively small number of trees represented by this proposed timber sale is not likely to have a significant impact on the probability of a catastrophic insect outbreak. And even if such an outbreak were to happen, the resultant dead trees would still provide high value to the ecosystem; while the removal of down trees would undoubtedly have harmful effects on the remaining trees that have been growing for hundreds of years.

These fallen trees are inextricably intertwined not only with one another, but in many cases with standing ancient trees, as can be seen in the attached photos. Pulling them out will inevitably scrape bark from living trees, uproot smaller trees, destroy other understory plants and disrupt the mycelium of mycorrhizal fungi. We would not be surprised to see standing old growth trees cut in order to "safely" remove fallen logs.

Furthermore, as stated in the NFP S&G, "Tree mortality is an important and natural process within a forest ecosystem. Diseased and damaged trees and logs are key structural components of late-successional and old-growth forests. Salvage of dead trees affects the development of future stands and habitat quality for a number of organisms. ... Coarse woody debris is a necessary component of forest ecosystems. This wood provides habitat for a broad array of vertebrates, invertebrates, fungi, mosses, vascular plants, and micro-organisms. Arthropods, salamanders, reptiles, and small mammals live in or under logs; woodpeckers forage on them; and vascular plants and fungi grow on rotting logs." (B-8)

Incidentally, if the understory is not damaged by tree removal, the openings left by this windthrow and others in the area may encourage big-leaf huckleberry growth without the need for the tree cutting proposed in #3 above.

The area lies within a Tier 1 Key Watershed, and appears to be within the Skagit Wild and Scenic River corridor of the Suiattle River. Both these classifications require special consideration. A full EA should be undertaken to fully evaluate the applicable provisions of the NFP and the effects of this proposal.



Suiattle blowdown



Suiattle blowdown

5. Buck Creek Campground Restoration:

We have not had time to visit this site, but have no objections to the proposal on its face, as it appears to protect and improve riparian habitat while benefitting recreational opportunities.

6. Road and trail storm repairs:

Some of these proposed repairs are no doubt innocuous or even beneficial, but without details it is impossible to know. As stated earlier, lack of motorized access to many of these sites coupled with the short time frame allowed for comments makes it impossible for us to visit and view them firsthand. Photographs of the damage would have been helpful in allowing members of the public to have some idea about what is involved in the needed repairs.

We feel that any road repairs requiring relocation or other major excavation work should be fully evaluated with an EA. We question the need for repair of Rd 2087, which is not needed for trailhead or other recreational access, to our knowledge. Similarly, it is not possible to tell from the provided map whether repair is planned for Rd 2081 (which does access the Peek-A-Boo Lake trail) or 2083; if the latter, it is not needed. For these unnecessary roads, the Forest Service should evaluate, preferably with an EA, whether work is needed to stabilize them and protect water quality.

Again, it is difficult to tell from the provided map, but it appears that Rd 2037 is also slated for repair. The reasons for maintaining this road are not discussed, nor is the severity of the damage. Here, too, if major repairs are required, an EA should be prepared to adequately evaluate the effects.

Having visited the Tenas Creek Road 2660 after the 2006 washout, when we argued against unsustainable repairs here, we assume that the current issue may have resulted from a slide area that we observed at that time. We again urge you to consider using this opportunity to convert the road beyond the damaged site to a trail, improving available recreational options by increasing trail miles. Again, an EA should be done to ensure that this repair does not jeopardize water quality and ESA-listed fish species.

We question the need for maintaining Road 4065 as well. Although it does access the Sunrise Mine trail, it is only approximately 2.3 miles long and so does not add appreciably to the length of the hike. Harvey Manning's 1988 edition of *100 Hikes in Washington's North Cascades-Glacier Peak Region* states, "The final ½ mile often is blocked by a slide." (p. 98). This chronic slide area appears to be one of the sites where repairs are again needed, in addition to upsizing several failed undersized culverts. We feel this is an ideal time to consider more sustainable options, such as decommissioning the road beyond the current washouts and maintaining this section as a trail. This would certainly be less costly than repeatedly repairing the road. This option should be seriously evaluated and considered, preferably with an EA.

It appears that work has already been done to partially clear the large rockslide on the Mountain Loop Highway (MLH), at the site of the southernmost "road repair" shown on Map 3 near Rd 2097 (T30N, R11E, S32; see photos). Not coincidentally, this is located downhill from the area of the 1998 Skull Thin Timber Sale. A creek runs through this area into the Sauk River, a Wild and Scenic River and spawning habitat to ESA-listed fish species. An EA should be prepared to evaluate the effects of this repair. We are concerned that work has already been done here without prior environmental analysis.

An EA most certainly should be undertaken for the major washout and debris flow on the MLH that we believe is located at Chocwich Creek (see photos). This slide is at least 100 feet wide and ten or more feet deep. The creek runs over and through it, directly into the South Fork Sauk River mere meters away. Woody debris strewn for several hundred meters down the road surface demonstrates the large volume of water that accompanied this slide. Any work done here requires a thorough analysis of alternatives, including placement of a bridge or conversion to a foot/equestrian/mountain bike trail. The National Marine Fisheries Services and Washington Department of Fish and Wildlife must be consulted.

There is an ongoing slide on the MLH just south of the Bedal gate that does not appear to be noted on the project maps (photo below). We suspect that this is at one of the sites that were repaired in 2006, perhaps at MP35.6. We reiterate the assertion that we have made many times over the past two decades, that the Mountain Loop Highway is an unsustainable road. Thorough environmental analysis should be conducted prior to initiating any of these repairs.



Roadwork at debris slide near Rd 2097



Debris slide on the MLH near Rd 2097



Woody debris strewn along roadbed at Chocwich Ck washout



Chocwich washout—for reference, the hiking pole is slightly over 1 meter tall



Chocwich Creek flowing over roadway



Chocwich Creek flowing over roadway



Slide near Bedal gate

7. Glacier Peak Data Collection:

We appreciate the apparent desire to limit helicopter use in this project by not transporting ground personnel by air. The flights should occur within specific time windows that will protect marbled murrelets and other sensitive wildlife species.

In summary, for many if not most of these projects, a full EA should be prepared. We urge you to reconsider use of a CE for proposals that may violate the NFP or otherwise harm aquatic and/or forest habitat. Thank you for considering these comments.

Sincerely,

Kathy Johnson
Forest Practices Chair
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Rick McGuire
Board member
North Cascades Conservation Council
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Attachment: PAS Comments re Darrington Collaborative Segelsen Timber Sale & Clear Creek Rd